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The Pitney Bowes Bank, Inc.; and Wheeler Financial
From Pitney Bowes Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

PACIFIC OFFICE AUTOMATION INC., an
Oregon corporation,

Plaintiff

v.

PITNEY BOWES INC., a Delaware corporation;
PITNEY BOWES GLOBAL FINANCIAL
SERVICES LLC, a Delaware limited liability
company; THE PITNEY BOWES BANK, INC,
a federal banking institution; and WHEELER
FINANCIAL FROM PITNEY BOWES INC., a
Delaware corporation,

Defendants.

Case No. 3:20-cv-00651-AC

**DEFENDANTS' UNOPPOSED
MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

LOCAL RULE 7-1 CERTIFICATION

The undersigned certifies that counsel have conferred, and that counsel for Plaintiff has indicated they do not oppose this request for an extension of time to respond to the Complaint.

MOTION

Pursuant to LR 16-3 and Fed. R. Civ. P. 6(b)(1)(A), Defendants move this Court for an order to extend the time to file their response to Plaintiff's Complaint in this matter up to and including June 30, 2020. Defendants' response to Plaintiff's Complaint is currently due on May 14, 2020.

This motion is made in good faith and not for purposes of delay. This is Defendants' first request to extend the deadline. The extension is requested due to the nature of the claims pled and the disruption caused by the COVID-19 pandemic.

Defendants' request is not opposed.

For the foregoing reasons, Defendants request the Court to extend the deadline for Defendants' response to Plaintiff's Complaint up to and including June 30, 2020.

RESPECTFULLY SUBMITTED THIS 5th day of May, 2020.

K&L GATES, LLP

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Pitney Bowes Global Financial Services LLC; The
Pitney Bowes Bank, Inc.; and Wheeler Financial
From Pitney Bowes Inc.

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of DEFENDANTS' UNOPPOSED MOTION TO EXTEND THE DEADLINE TO RESPOND TO PLAINTIFF'S COMPLAINT to be served upon all counsel of record to this matter on this 5th day of May, 2020, via the Court's CM/ECF System.

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DATED this 5th day of May, 2020.

s/Philip Van Der Weele
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